48. Please provide all documents relating to any information or notification You and/or the Charities received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Charities was associated with or involved in: (1) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal, corrupt or deviant activities; or (iii) any military or terrorist activity, plot, or attack.

ANSWER:

49. Please provide all documents relating to any information or notification You and/or the Charities received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Charities may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists, persons, or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaeda, other terrorist organizations, and/or individuals sympathetic to al Qaeda or other terrorist organizations, regardless of whether you believe such individual(s) or entity(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

50. Please provide all documents relating to any information or notification You and/or the Charities received prior to September 11, 2001 that any individual or entity employed by and/or affiliated with the Charities was associated with or involved in: (i) providing funds,

services, assets, medical assistance, or any other form of support to mujahideen in any part of the World; or (ii) providing financial, logistical, religious, political, or any other form of assistance in relation to any armed jihad, regardless of whether such jihad was declared legitimate by competent religious authorities.

ANSWER:

51. Please provide all documents You and/or the Charities sent to, and/or received from, any third party relating to the alleged involvement of any individual or entity employed by and/or affiliated with the Charities in any criminal, corrupt, deviant, or extremist activity, including without limitation any terrorist or radical religious, political, or social activities.

ANSWER:

52. Please provide all documents You and/or the Charities sent to, and/or received from, the Kingdom of Saudi Arabia relating to any accusation that any individual or entity employed by and/or affiliated with the Charities, was associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation any terrorist or radical religious, political, or social activities.

ANSWER:

53. Provide copies of all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in

conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaeda, other terrorist organizations and/or individuals sympathetic to al Qaeda or other terrorist organizations.

ANSWER:

54. Please provide all documents relating to any internal investigations conducted by You and/or the Charities into any alleged criminal, corrupt, deviant, or extremist activities of any individual or entity employed by and/or affiliated with the Charities, including without limitation any terrorist or radical religious, political, or social activities.

ANSWER:

55. Please provide all documents relating to any action taken by You and/or the Charities to prevent criminal activities, including the sponsorship of terrorists or radicals, by any individual or entity employed by and/or affiliated with the Charities or any of their branch offices.

56. Please provide all documents relating to any action taken by You and/or the Charities to remove or purge radical or corrupt elements or individuals from the Charities' branch offices.

ANSWER:

57. Please provide all documents relating to any disciplinary action taken by You and/or the Charities, or any decision to terminate any relationship with any of the Charities' subsidiaries, affiliates, branch offices, officers, directors, trustees, board members, committee members, managers, agents, employees, volunteers, and/or representatives as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

58. Please provide all documents relating to any disciplinary action taken by You and/or the Charities, or any decision to terminate any relationship with any of the Charities' supporters, donors, suppliers, contributors, facilitators, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

59. Please provide copies of all documents that have been seized by, or produced by You and/or the Charities to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses the Charities' alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

60. Please provide all documents, statements, interviews, press releases, internal memos, or other materials relating to any accusation that the Charities, or any individual or entity employed by and/or associated with the Charities, was associated with or involved in any military or terrorist activity, plot or attack, indicating an intention to direct conduct against or target conduct toward the United States of America.

ANSWER:

61. Please provide all documents relating to any sanctions imposed upon the Charities by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

62. Please produce all documents relating to any meetings, conferences, or gatherings You attended during Your tenure with the Charities relating to any accusation that the Charities, or any individual or entity employed by and/or associated with the Charities, was misusing or

misappropriating funds, engaging in criminal, corrupt, deviant, or extremist activities, sponsoring terrorist activities, and/or providing material support or resources to Osama bin Laden, al Qaeda and/or affiliated terrorist organizations. Responsive documents shall include, but are not limited to, any materials relating to meetings with representatives of the Kingdom of Saudi Arabia, the Saudi royal family, the Charities, and/or representatives from other foreign countries or international bodies.

ANSWER:

63. Please provide all documents relating to the MWL's secret office (Al Maktab Al Siri).

ANSWER:

64. Please provide all documents relating to the MWL's special or private office (Al Maktab Al Khass).

ANSWER:

65. Please provide all documents relating to any investigation or inquiry conducted by any United States Investigator, any Foreign Investigator, or any KSA Investigator, relating to You.

66. Please provide copies of all documents that have been seized by, or produced by You to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, concerning any investigation or inquiry relating to You.

ANSWER:

67. Please provide all documents relating to any sanctions imposed upon You by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.

ANSWER:

68. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between the Charities and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Da'wah and Guidance; the Ministry of Foreign Affairs, Endowments, Da'wah and Guidance; the Ministry of Defense and Aviation, Endowments, Da'wah and Guidance; the Majlis al Shura (a/k/a the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

69. Please provide all documents the Charities sent to, and/or received from, the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Da'wah and Guidance; the Ministry of Foreign Affairs, Endowments, Da'wah and Guidance; the Ministry of Defense and Aviation, Endowments, Da'wah and Guidance; the Majlis al Shura (a/k/a the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.

ANSWER:

70. Please provide all documents governing, describing, detailing, or otherwise relating to the Charities' role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.

ANSWER:

71. Please provide all documents governing, describing, detailing, or otherwise relating to the Charities' role in advancing the foreign policy objectives of the KSA.

ANSWER:

72. Please provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution the Charities currently hold, or have held,

jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.

ANSWER:

73. Please provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of the Charities (including any subsidiary, affiliate, or branch office).

ANSWER:

74. Please provide all documents relating to the Charities' initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

75. Please provide all documents defining, establishing, or relating to the Charities' privileges, obligations, activities, and/or rights under the laws of the KSA.

76. Please provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to the Charities, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over the Charities' operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

77. Please provide all documents relating to any fundraising events and/or conferences that were held for the benefit of the Charities and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

78. Please provide all documents relating to any meeting between officers or representatives of the Charities and any official or agency of the KSA, including without limitation, all meetings attended by representatives of the Kingdom of Saudi Arabia, members of the Saudi royal family, and/or representatives or special advisors from the King's chambers.

ANSWER:

79. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, relating to the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, and Yemen. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

ANSWER:

80. Please provide all documents relating to fundraising activities conducted by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, in relation to relief or humanitarian efforts, or other operations, in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, and Yemen.

ANSWER:

81. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, discussing the legitimacy of any armed jihad or resistance by Muslims in Afghanistan, Albania,

Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Russia, Sudan, Somalia, Tanzania, Turkey, and Yemen. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

ANSWER:

82. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, discussing the provision of support to mujahideen forces in any part of the World. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or indirectly. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

ANSWER:

83. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, discussing the provision of support to any armed jihad in any part of the World, regardless of whether such jihad was declared legitimate by competent religious authorities. For purposes of this request, the term "support" includes any form of financial, medical, logistical, administrative, religious, political or any other form of assistance, whether provided directly or

indirectly. Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

ANSWER:

84. Please provide all documents authored, published, or disseminated by You during Your tenure as an official representative of the Charities and/or Saudi Arabian government, which mention "jihad" (see Definition No. 28). Responsive documents shall include, but are not limited to, copies of all interviews, statements, or speeches by You relating to same.

ANSWER:

85. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Osama Bin Laden (including any member of the Bin Laden family).

ANSWER:

86. Please provide all documents You and/or the Charities sent to and/or received from Osama Bin Laden or any member of the Bin Laden family, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and Osama Bin Laden, and/or any member of the Bin Laden family.

87. Please provide all documents relating to al Qaeda.

ANSWER:

88. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and al Qaeda, or any member of al Qaeda.

ANSWER:

89. Please provide all documents illustrating, describing, or otherwise relating to al Qaeda's formation and organizational structure, the duration of al Qaeda's existence, any documents relating to al Qaeda's initial capitalization and subsequent funding, any documents relating to the duties and powers of any al Qaeda boards and/or committees, and/or any other writing relating to the creation or purpose of al Qaeda.

ANSWER:

90. Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of al Qaeda, including without limitation, al Qaeda's Majlis al Shura ("consultation council"), military committee, and fatwah committee.

91. Please provide all documents identifying each member, officer, board member, and/or committee member of al Qaeda, including without limitation, any and all documents relating to their appointment, resignation, and/or termination.

ANSWER:

92. Please provide all documents relating to any meetings of members, officers, boards, committees, and/or internal bodies of al Qaeda, including without limitation, any agendas or meeting minutes.

ANSWER:

93. Please provide all documents relating to any meeting, conference, or gathering that You attended at which any of the persons identified in Attachment A were present.

ANSWER:

94. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between You and/or the Charities and the persons and/or entities identified in Attachment A.

95. Please provide all documents You and/or the Charities sent to, and/or received from, the persons and/or entities identified in Attachment A, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and those persons and/or entities.

ANSWER:

96. From the period beginning January 1, 1988 through 1997, please provide all documents relating to any trips you took to Sudan.

ANSWER:

97. From the period beginning January 1, 1988 through 2002, please provide all documents relating to any trips you took to Afghanistan.

ANSWER:

98. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Mohammed Jamal Khalifa (a/k/a Abu Bara). Responsive documents shall include, but are not limited to, Khalifa's personnel or employment files.

99. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and Wa'el Hamza Jelaidan (a/k/a Abu Hasan al Madani). Responsive documents shall include, but are not limited to, Jelaidan's personnel or employment files.

ANSWER:

100. Please provide all documents You and/or the Charities sent to, and/or received from, the Kingdom of Saudi Arabia and/or any third party, relating to any accusation that Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, were associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation, any terrorist or radical religious, political or social activities.

ANSWER:

101. Please provide all documents relating to any internal investigation conducted by You and/or the Charities relating to any accusation that Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, were associated with or involved in any criminal, corrupt, deviant, or extremist activity, including without limitation, any terrorist or radical religious, political, or social activities.

102. Please provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with Khalifa or Jelaidan, including any individual or entity affiliated with those individuals, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

103. Please provide all documents relating to any business, employment, financial, charitable, religious, or other relationship between You and/or the Charities and any of the Golden Chain-Related Individuals, and/or any individual or entity associated therewith.

ANSWER:

104. Please provide all documents You and/or the Charities sent to, and/or received from, any of the Golden Chain-Related-Individuals, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and the any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

ANSWER:

105. Please provide all documents relating to any accounts in any banking or financial institution You hold or held jointly with, or on behalf of any of the Golden Chain-Related-

Individuals, and/or any individual or entity associated therewith, including any accounts over which You hold or have held signatory authority.

ANSWER:

106. Please provide all documents relating to any accounts in any banking or financial institution any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, hold or held jointly with, or on behalf of the Charities, including any accounts over which the Golden Chain-Related-Individuals hold or have held signatory authority.

ANSWER:

107. Please provide all documents relating to any investigations or inquiries conducted by any United States Investigator, Foreign Investigator, or KSA Investigator, into financial transactions linked to accounts held solely or jointly by any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith.

ANSWER:

108. Please provide all documents relating to any decision to terminate any relationship with any of the Golden Chain-Related-Individuals, and/or any individual or entity associated therewith, as a result of financial irregularities, suspicious activities, investigations

into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

109. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between You and/or the Charities and the persons and/or entities identified in Attachment B.

ANSWER:

110. Please provide all documents You and/or the Charities sent to, and/or received from, the persons and/or entities identified in Attachment B, including without limitation, all documents relating to the transfer of funds between You and/or the Charities and/those persons and/or entities.

ANSWER:

111. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between You and/or the Charities and the persons identified in Attachment C ("Guantanamo Bay Detainees"). Responsive documents shall include, but are not limited to, their personnel or employment files.

112. Please provide all documents relating to any meetings, interviews, or dialogue You and/or the Charities have had with any individual held at Guantanamo Bay, Cuba, including without limitation, the persons identified in Attachment C ("Guantanamo Bay Detainees").

ANSWER:

113. Please provide all documents relating to any understanding or agreement with any defendant named in the consolidated civil action, 03 MDL 1570, whereby You have agreed to pay, indemnify, or reimburse any of their costs associated with defending this lawsuit, including legal fees and/or payments to satisfy part or all of a judgment that may be entered in this action against such defendant. Responsive documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

ANSWER:

114. Please provide all documents relating to any understanding or agreement between You and any individual, entity, and/or government, whereby such party has agreed to pay, indemnify, or reimburse You for any of the costs associated with defending this lawsuit, including legal fees and/or payments to satisfy part or all of a judgment that may be entered in this action against You. Responsive documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

Dated: August 22, 2013

Respectfully submitted,

THE MDL 1570 PLAINTIFFS EXECUTIVE COMMITTEES

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' First Set of Jurisdictional Requests for Production of Documents Directed to Abdullah al Obaid was served via electronic mail and U.S. first-class mail, postage prepaid, this 22nd day of August 2013, upon:

Alan R. Kabat, Esq.
Bernabei & Wachtel, PLLC
1775 T Street, N.W.
Washington, D.C. 20009-7102

(Counsel for Defendant Abdullah al Obaid and Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

J. Scott Tarbutton, Esc

ATTACHMENT A

Abdullah Ahmed Abdullah (a/k/a Abu Mohamed al Masry)

Abdullah Azzam

Abu al Hasan al Maki

Abu Anees (a/k/a Abu Anis; a/k/a Abu Anas; a/k/a Abu Enes; a/k/a Abdelaziz Zaher)

Abu Ayoub

Abu Burnhan

Abu Hajir (a/k/a Abu Hajer)

Abu Hamam al Saudi

Abu Ibrahim

Abu Ubaidah al Banshiri

Abu Zubaydah

Adel Batterjee

Adel Farhat

Ahmed Saeed Khidir

Al Gama'a al Islamiyya (a/k/a "The Islamic Group")

Al Masadah (a/k/a the "Lion's Den")

Ali Mohamed

Bait-ul-Ansar (a/k/a the "Mujahadeen Services Bureau" or "House of Helpers")

Dhiaul Haq

Dr. Ayman Al Zawahiri

Egyptian Islamic Jihad

Enaam Arnaout (a/k/a Abu Mahmoud al Suri)

Human Concern International

Jamal al Fadl

Khalid Sheikh Mohamed

Lajnat al Bir al Islamiyah

Lajnat al Dawa al Islamiyah

Madani al Tayyib

Maktab al Khidmat (a/k/a the "Office of Services")

Mahmoud Mehdi

Mamdouth Mahmud Salim (a/k/a Abu Hajer)

Mercy International

Mohammed Jamal Khalifa

Mohammed Atef

Mohammed Loay Bayazid (a/k/a Abu Rida al Suri; a/k/a Nidal)

Mohammed Suleiman al Nalfi

Muhsin Musa Matwalli Atwah (a/k/a Abdel Rahman al Muhajer)

Nasser Ahmed Bahri

Osama Bin Laden (a/k/a Abu Abdallah)

Ramzi Yousef

Saif al Adel

Sheikh Abdel Majeed Zindani

Sheikh Abdullah Azzam

Sheikh Tameem Wadih Elias El Hage Wael Jelaidan (a/k/a Abu al Hassan al Madani) Wali Khan Amin Shah Yusif Hamdan Zahid Sheikh Mohamed

ATTACHMENT B

Abd al Hamid Sulaiman al Mujil

Abdullah Kamil Abdullah Hashaikah

Abdurajak Abubakar Janjalani

Abu Musab al Djazairi (a/k/a Djamel Lamrani)

Abu Oua'il

Abu Sayyaf Group

Adel Muhammad Said bin Kazam (a/k/a Adel Muhammad Sadiq bin Kazem)

Benevolence International Foundation

BMI, Inc. (a/k/a BMI Construction Fund Limited Partnership; BMI Finance & Investment; BMI

Leasing; BMI Limited Partnership; BMI Leasing Limited Partnership II, BMI Real Estate

Development, Inc.; and BMI Trade and Investment, Inc.)

Dar al Imam al Shafi'i

Egyptian Islamic Jihad

H.E. Sheikh Mustafa Bin Muhammad Irdis

Hossam Meawad Mohammad Ali

Ihab Ali

International Islamic Charitable Organization

Jamal al Jibouri

Jemaah Islamiyah

M. Yaqub Mirza

Mahmoud Jaballah

Mohamed Abdul Yamani

Moro Islamic Liberation Front (MILF)

Moro National Liberation Front (MNLF)

Muhammad Sa'd Darwich al Shazy

Muwafaq Foundation

Noor Umog

Randall Todd Royer (a/k/a Ismail Royer)

Saudi High Commission

Saudi Joint Relief Committee for Kosovo and Chechnya

Saudi Red Crescent

Sayed Abu Nesir

Sheikh Ahmed al Gamdin

Soliman Biheiri

Sulaiman al Ali

The Taliban

Third World Relief Agency

World Assembly of Muslim Youth

Yassin Abdullah al Kadi

ATTACHMENT C

Abdallah Ibrahim al Rushaydan Abdel Hadi Mohamed Badan al Sebaii Sebaii Abdul Latif Elbanna Abdul Rahman Oawid Mohammad al Juaid Ahmed Hassan Jamil Suleyman Fahd Muhammed Abdullah al Fouzan Ghanim Abd al Rahman Ghanim al Huwaymadi al Harbi Jamal Muhammad Alawi Mari Khalid Mahomoud Abdul Wahab al Asmr Rashed Awad Khalaf Balkhair Rashid Abd al Muslih Qaid al Qaid Said Muhammad Husayn Qahtani Sami al Haj Samir N. al Hassan Tariq Mahmoud Ahmed al Sawah Wasm Awwad Umar Wasim Zaid Muhammad Sa'ad al Husayn